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Dodson

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FREE SPEECH COALITION, INC. et  
al.,

Plaintiffs,

v. No. 09-4607

THE HONORABLE ERIC H. HOLDER,

Defendant.

March 15, 2013  
12:50 p.m.

Deposition of BETTY DODSON, taken by  
Defendant, at the United States Attorney's  
Office, One St. Andrew's Plaza, New York, New  
York, before Samuel G. Mauro, Jr., a Registered  
Merit Reporter and Notary Public of the State of  
New York.

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A. Yes.

Q. So even if Section 2257 currently is the law, you have continued doing that? You have continued doing your work?

A. Yes. Unless we win the lawsuit,  
ba-ba-ba.

Q. Has the statute prevented you from doing your work?

A. Oh, yeah. One of my research projects the Genital Art Gallery, the country is drenched, male and female, in genital shame. The fig leaf has got to come off.

So, in order to do this, I requested people send in an image of their genitals, and they give me just a little information about the first time they masturbated, how did you start? How did you discover your sexuality? Now, some go into great lengths and some say very little.

But there was, until you guys came along with your 2257, this was my research project, and it was very healing for people to see a huge range of genitals, because we are all different. And in porn -- which is not what I am, I am education -- the female genitals are

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altered for the boys' taste. They all end up looking like little dolls. And the males are chosen in porn because they've got big dicks, and this does not represent the population in terms of their genitals.

So everybody is walking around thinking there is something wrong with what's between their legs. This is damaging, damaging to everyone's sex life. As an educator I am dedicated to changing that.

Q. How many depictions of genitals are there in the Genital Art Gallery?

A. Well, there were many, many before your law came out.

Q. How many?

A. I've never counted them, honey.

Q. Would you say that hundreds?

A. Yes, I had hundreds, more than, yes, many hundreds.

Q. Right now, if I go to your website, do you know how many there are?

A. No, but you're welcome to go and count.

Q. Would you say that there's more than

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50?

A. More than 50. I am so disheartened with what's gone on because it's literally brought that project of mine to a halt that I haven't been there lately. No. It's depressing. I'm answering questions directly to people who write in to me.

9 Q. Have you received submissions for your  
10 gallery after the law that you are challenging  
11 took effect?

12           A.     No, it stopped. I mean a couple,  
13 yeah. They're not going to send their driver's  
14 license and all that information. It's  
15 daunting. The whole thing was based on  
16 anonymity.

17 If you're anonymous, you will tell the  
18 truth. But if you think it's going to be under  
19 your own name, ew, especially when it comes to  
20 sexuality, you know, America and sex, we're  
21 idiots.

22 Q. Have you had people tell you that they  
23 are not going to submit images?

24               A.     They don't have to tell me. It's not  
25 coming in.



Dodson  
CERTIFICATE

STATE OF NEW YORK )

: ss

COUNTY OF NEW YORK)

I, Samuel Mauro, Jr., a Registered  
Merit Reporter and Notary Public within and for  
the State of New York, do hereby certify:

That BETTY DODSON, the witness whose  
deposition is hereinbefore set forth, was duly  
sworn by me and that such deposition is a true  
record of the testimony given by such witness.

I further certify that I am not  
related to any of the parties to this action by  
blood or marriage and that I am in no way  
interested in the outcome of this matter.

In witness whereof, I have hereunto  
set my hand this \_\_\_\_\_ day of  
\_\_\_\_\_. 2\_\_\_\_\_.

SAMUEL G. MAURO, RMR